

**LOCAL BANKRUPTCY FORM 9013-4**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Megan Perry a/k/a  
Megan P. Thomas

**CHAPTER** 13

**CASE NO.** 1 - 15 -bk- 00825-MDF

**Debtor(s)**

Megan Perry a/k/a Megan P. Thomas

**ADVERSARY NO.**     -     **ap-**                       
**(if applicable)**

**Plaintiff(s)/Movant(s)**

**vs.**

Wells Fargo Bank, N.A., York County Tax Claim  
Bureau, Lower Windsor Township, Eastern York  
School District, Lowell K. Thomas, II

**Nature of Proceeding:**                                     

Sale Motion

**Defendant(s)/Respondent(s)**

**Document #:** 85

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Counsel for the secured creditor is unavailable. Also, the parties are negotiating as to the terms of a short sale.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 09/13/2016

s/ Robert E. Chernicoff

Attorney for Debtor

Name: Robert E. Chernicoff

Phone Number: 717 238 6570

<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.